

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Cargill, Incorporated

Movant,

vs.

Public Joint Stock Company National Bank Trust

Respondent.

No. 23 Misc. _____

**NOTICE OF MOTION
ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the declarations of Oliver Clifton and Daniel L. Stein, the exhibits attached thereto, and oral argument on a date and at a time to be set by the Court, Movant Cargill, Incorporated hereby moves this Court for an order (i) quashing the subpoenas that Public Joint Stock Company National Trust Bank (the “Respondent”) sought leave to serve pursuant to a 28 U.S.C. § 1782 application, and (ii) providing other such relief as the Court deems just and proper.

Respectfully submitted,

April 28, 2023

By: /s/ Daniel L. Stein _____

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